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Attorney for Defendant
HOOTAN MELAMED

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

HOOTAN MELAMED (1),

Defendant.

CASE NO. 16CR1409H

**UNOPPOSED MOTION
AUTHORIZING TRAVEL AND
MODIFYING BOND FOR
DEFENDANT HOOTAN
MELAMED DURING PRETRIAL
RELEASE**

**[[PROPOSED] ORDER LODGED
CONCURRENTLY HEREWITH]**

Defendant Hootan Melamed ("Melamed"), by and through his counsel of record, Steven M. Goldsobel, hereby brings this Unopposed Motion for Travel During Pretrial Release.

1. On June 16, 2016, Melamed was indicted in *United States v. Melamed, et al.*, Case No. 16CR1409H, and, currently, he is on pretrial release. Melamed currently is authorized to travel throughout the State of California.

2. Melamed wishes to visit a close friend from September 21, 2016 through September 23, 2016. Melamed plans to travel from Los Angeles, California to Phoenix, Arizona and then to Las Vegas, Nevada on September 21, 2016 and return from Las Vegas, Nevada to Los Angeles, California on September 23, 2016.

3. Assistant United States Attorney Valerie H. Chu ("Ms. Chu") does not

**UNOPPOSED MOTION AUTHORIZING TRAVEL AND MODIFYING BOND FOR
DEFENDANT HOOTAN MELAMED DURING PRETRIAL RELEASE**

1 oppose this request, so long as Melamed provides Ms. Chu and Pretrial Services
2 with Melamed's itinerary before leaving and Melamed notifies Pretrial Services of
3 Melamed's travel from and return to Los Angeles, California. Pretrial Services
4 also does not oppose this request.

5 4. Ms. Chu and Pretrial Services also do not oppose a modification of
6 Melamed's bond to allow for travel to and from Las Vegas, Nevada, so long as
7 Melamed obtains prior approval from Pretrial Services.

8 5. Accordingly, Melamed respectfully requests that the Court enter an
9 order authorizing Melamed to travel to Phoenix, Arizona and then to Las Vegas,
10 Nevada on September 21, 2016 and return from Las Vegas, Nevada to Los
11 Angeles, California on September 23, 2016.

12 6. Melamed further requests that his bond be modified to allow for travel
13 to and from Las Vegas, Nevada, with prior approval of Pretrial Services.

14 Dated: September 19, 2016 Respectfully submitted,

15
16 LAW OFFICES OF STEVEN GOLDSOBEL
17 A PROFESSIONAL CORPORATION

18 By: /s/ Steven M. Goldsobel
19 STEVEN M. GOLDSOBEL
20 Attorney for Defendant Hootan Melamed

21 Dated: September 19, 2016 LAURA E. DUFFY
22 UNITED STATES ATTORNEY

23 By: /s/ Valerie H. Chu
24 Valerie H. Chu
25 Assistant United States Attorney
26 Attorney for Plaintiff
27 United States of America
28

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1 Dated: September 19, 2016 DAMION DAVIS
2 PRETRIAL SERVICES OFFICER

3 By: /s/ Damion Davis
4 Damion Davis
5 Pretrial Services Officer
6 United States District Court for the Central
District of California

7 Dated: September 19, 2016 YOLANDA GERMAN
8 PRETRIAL SERVICES OFFICER

9 By: /s/ Yo/anda German
10 Yolanda German
11 Pretrial Services Officer
12 United States District Court for the
Southern District of California

13 **NOTICES OF ACKNOWLEDGMENT**

14 I, Hootan Melamed, hereby acknowledge that, in connection with this
15 request for travel to Las Vegas, Nevada, and any future request for travel to Las
16 Vegas, Nevada, I need to provide Ms. Chu and Pretrial Services with my itinerary
17 before leaving and I need to notify Pretrial Services of my departure from and
18 return to Los Angeles, California.

19 Dated: 09/19/16

Signed: 

Defendant Hootan Melamed

20 I, Houshang Melamed, hereby acknowledge and consent to Hootan
21 Melamed's request to travel to Phoenix, Arizona and then to Las Vegas, Nevada on
22 September 21, 2016 and return from Las Vegas, Nevada to Los Angeles, California
23 on September 23, 2016. I further acknowledge and consent to Hootan Melamed's
24 request to modify the bond to allow for travel to and from Las Vegas, Nevada, with
25 the prior approval of Pretrial Services.

26 Dated: 09/19/16

Signed: 

Surety Houshang Melamed

SIGNATURE CERTIFICATION

I hereby attest that all other signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.

Dated: September 19, 2016

/s/ Steven M. Goldsobel

Steven M. Goldsobel

Steven M. Goldsobel (State Bar No. 166405)
Katherine A. Bowles (State Bar No. 287426)
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Attorney for Defendant
HOOTAN MELAMED

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

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PROOF OF SERVICE

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STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 1901 Avenue of the Stars, Suite 1750, Los Angeles, CA 90067.

On September 19, 2016, I served the foregoing document described as:

**UNOPPOSED MOTION AUTHORIZING TRAVEL AND MODIFYING
BOND FOR DEFENDANT HOOTAN MELAMED DURING PRETRIAL
RELEASE**

on the interested parties in this action by placing true copies thereof enclosed in a sealed envelope, addressed as follows:

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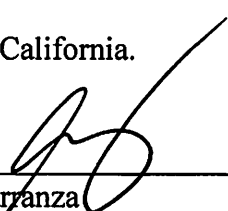
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2 **[X] BY ELECTRONIC MAIL OR ELECTRONIC TRANSMISSION:**

3 Based on a court order or an agreement of the parties to accept service by e-
4 mail or electronic transmission, I caused the document to be sent to the respective e-
5 mail addresses of the parties. I did not receive, within a reasonable time after the
6 transmission, any electronic message or other indication that the transmission was
7 unsuccessful.

8 I declare under penalty of perjury under the laws of the State of California that the
9 foregoing is true and correct.

10 Executed on September 19, 2016, at Los Angeles, California.

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12 _____
13 Samantha Carranza
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PROOF OF SERVICE